

**EXHIBIT F**

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

AMANDA VALENZUELA,	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	Civil Action No. 1:19-cv-01202-RP
	§	
THE UNIVERSITY OF TEXAS	§	
AT AUSTIN and JOHN CLARKE	§	
<i>Defendants.</i>	§	

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**DECLARATION OF AUSTIN HUNTER THOMAS**

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1. My name is Austin Hunter Thomas, and I am of sound mind, over the age of eighteen years, have never been convicted of a felony or crime involving moral turpitude, am capable of making this Declaration, have personal knowledge of the matters contained in this Declaration, and am fully competent to make this Declaration.

2. I hereby declare that I am employed as Senior Graphic Designer in the Department of Art and Art History at The University of Texas at Austin (“UTAustin”). I have held this position since October 1, 2008.

3. In my position at UTAustin, my job responsibilities include graphic design and front-end management of web properties for the department and its entities.

4. To the best of my recollection and understanding, the pertinent facts of this declaration are as follows.

- In the fall semester of 2016, a single page was added to the department website that included a list of names of students enrolled in the Art History MA and PhD programs, along with their prior degree(s) earned, a short list of research interests,

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and a link to their [Academia.edu](https://Academia.edu) profile (if applicable). This page was added as a stopgap measure until a full section of profile pages (one for each student) could be added to a new version of the department website that was being planned and was scheduled to launch in 2017. The section of profile pages, as well as the single “stopgap” page, had been requested by the Graduate Student Art History Association (GSAHA), and the list of student names to be included on the single “stopgap” page was provided to me by the GSAHA’s Secretary. It is my understanding that she had contacted all Art History graduate students, requesting submission of relevant information should they wish to be included on the website, which she then compiled into the list she provided me. That list of people does not include the Plaintiff.

- In April 2017, the GSAHA's Secretary provided to me content (biographical information and headshots) to populate the graduate student profile pages on the forthcoming new website, which was scheduled to launch in summer 2017. Again, it is my understanding that she had requested submission of that content to her by those graduate students who wished to have a profile page on the website. Inclusion was voluntary and on an “opt-in” basis. Along with the content, the Secretary shared a spreadsheet she had used to keep track of the content she was gathering from other students. The Plaintiff’s name is included on that spreadsheet, but an adjacent “Profile notes” column indicates “No info provided; use last semester”. No biographical information or headshot for the Plaintiff were provided in the set of files I ultimately received from the GSAHA Secretary. Today, I don’t recall what was intended by “use last semester”. My guess is that the Secretary meant to use

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the details from the list of names she provided in fall 2016. If that guess is accurate, because the Plaintiff was not included on that list, it's possible that she may have been excluded from the initial set of profile pages that were in place on the website when it launched in August 2017. I currently have no means to "look back at" the version of the website when it launched to know which graduate students at the time were included or not.

- However, in November 2017, I sent an email directly to Art History graduate students via their listserv requesting content from those students (primarily those who were new to the program as of fall 2017) who did not at the time have a profile page on the website but wished to. I have no email or record of response from the Plaintiff indicating a profile page for her was missing and she wished for one to be added.
- Near the beginning of each subsequent fall semester (August 2018 and September 2019), I've sent similar emails to graduate students via their listservs requesting content for new profiles to be added, or edits to existing profiles. I have no record of contact from the Plaintiff regarding inclusion in the graduate student profiles.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 23, 2020

  
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AUSTIN HUNTER THOMAS